

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

DIANA MEY,

Plaintiff,

v.

CASTLE LAW GROUP, PC,

a Tennessee Corporation;

JUDSON PHILLIPS, ESQ.,

an individual;

CASTLE VENTURE GROUP, LLC,

A Tennessee limited liability company;

CASTLE EQUITY GROUP, INC.,

A Tennessee corporation;

CASTLE PARTNERS INC.,

A Tennessee corporation;

CASTLE MARKETING GROUP, LLC,

A Tennessee limited liability company;

TRISTAR CONSUMER GROUP,

A Tennessee Corporation;

MUSIC CITY VENTURES,

A Tennessee corporation;

TRISTAR CONSUMER LAW,

A Tennessee Corporation;

TRISTAR CONSUMER LAW

ORGANIZATION;

A Tennessee Corporation;

AMERICAN CONSUMER RIGHTS

ORGANIZATION;

A Tennessee Corporation;

TRISTAR CONSUMER LAW

FOUNDATION,

A Tennessee Corporation;

CAPITAL COMPLIANCE GROUP, CO.,

A Tennessee Corporation;

CAPITAL COMPLIANCE GROUP, INC.,

A Tennessee Corporation;

CAPITAL RECOVERY LAW, PC.,

A Tennessee Corporation;

ADVOCUS LEGAL ORGANIZATION,

A Tennessee Corporation;

US CONSUMER ADVOCATES,

A Tennessee Corporation;

BRUYETTE AND ASSOCIATES, LLC,

A Florida corporation;

SEAN AUSTIN, an individual;

WILLIAM MICHAEL KEEVER, an individual;

ASHLEY R. KEEVER, an individual;

STEVE HUFFMAN, an individual;

Civil Action No. 5:19-cv-185

JOHN PRESTON THOMPSON, an individual;

And JOHN DOES 1-10, corporate entities and
individuals presently unknown,

Defendants.

DEFENDANT JOHN PRESTON THOMPSON'S
RULE 26(a)(3) PRETRIAL DISCLOSURES

Now comes Defendant John Preston Thompson, and for his pretrial disclosures, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and local court rules, provides the following information and documents:

(i) the name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises

1. Sean Austin
2 International Plaza, Suite 900
Nashville, TN 37217

2. Mr. Austin may have knowledge of facts as set forth in the complaint and defenses of the same.

3. Judson Phillips
3117 Vera Valley Road
Franklin, TN 37064

Mr. Phillips may have knowledge of facts as set forth in the complaint and defenses of the same.

4. Steve Huffman

Mr. Huffman may have knowledge of facts as set forth in the complaint and defenses of the same.

5. John Preston Thompson

Mr. Thompson may have knowledge of facts as set forth in the complaint and defenses of the same.

6. Tom Garden

Mr. Garden is an unknown individual but it is believed that he possesses knowledge of facts as set forth in the complaint.

7. William Michael Keever
7100 Commerce Way, Suite 185
Brentwood, TN 37027

It is unknown what knowledge Mr. Keever may have regarding the facts as set forth in the complaint.

8. Ashley Keever
112 Public Square
Gallatin, TN 37066-2803

It is unknown what knowledge Mrs. Keever may have regarding the facts as set forth in the complaint.

9. Diana Mey
436 Springdale Avenue
Wheeling, WV 26003

Mrs. Mey is expected to testify as to the facts as set forth in the complaint.

10. Any individual disclosed by Plaintiff in her Rule 26(a)(3) pretrial disclosures.

(ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition;

Defendant John Preston Thompson does not intend to present testimony by deposition.

(iii) an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

- (1) Court Pleadings from Mey v. Castle Law Group, PC, et al.
- (2) Phone call recordings in the possession of Plaintiff.
- (3) Phone call records in the possession of Plaintiff.
- (4) Secretary of State documentation related to ownership of certain entities.
- (5) Any documentation related to Plaintiff's other civil actions.
- (6) Any other exhibits identified by Plaintiff in her Rule 26(a)(3) Pretrial Disclosures and discovery responses to be filed and/or supplemented.

Defendant,
John Preston Thompson,
by counsel,

/s/ Paul J. Harris
Paul J. Harris
W.Va. Bar 4673
Harris Law Offices
Fifteenth & Eoff Streets
Wheeling, WV 26003
304.232.5300

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Defendants.

CERTIFICATE OF SERVICE

I hereby certify that this *Defendant John Preston Thompson's Rule 26(a)(3) Pretrial Disclosures* was electronically filed with the Clerk of the Court via the CM/ECF filing system this 31st day of January, 2022, which will send such notification to the following:

John W. Barrett, Esq.
Jonathan R. Marshall, Esq.
Sharon F. Iskra, Esq.
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/s/ Paul J. Harris
Paul J. Harris